

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

**In Re ST. PAUL TRAVELERS
SECURITIES LITIGATION**

) Civ. No. 04cv3801 (JRT/FLN)
)
)
)
) **MOTION FOR FINAL**
) **APPROVAL OF SETTLEMENT,**
) **PLAN OF ALLOCATION AND**
) **CERTIFICATION OF**
) **SETTLEMENT CLASS**
)

Plaintiff hereby moves this Court for Entry of a Order:

- (a) granting final approval of the proposed Settlement;
- (b) approving the Plan of Allocation of the Settlement Fund;
- (c) certifying a settlement class; and
- (d) granting plaintiffs' petition for attorneys' fees and reimbursement of expenses.

This motion will be based on all pleadings, files and records herein, including the accompanying memoranda of law and supporting documents.

Respectfully submitted,

Dated: December 23, 2005

s/Renae D. Steiner
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